

97-A48

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## United States Department of the Interior

BUREAU OF RECLAMATION  
Mid-Pacific Regional Office  
2800 Cottage Way  
Sacramento, California 95825-1898

IN REPLY  
REFER TO:

MP-150  
ENV-2.00

OCT 28 1997

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Mr. Lester A. Snow  
Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, California 95814

Subject: Review Comments

Dear Mr. Snow:

The Bureau of Reclamation is pleased to provide comments on the "Phase II Alternative Descriptions" document, and technical appendices.

We wish to acknowledge the time and staff resources required to develop these documents and to commend CALFED on their continuing efforts in assembling and analyzing the various alternative solutions to the Bay-Delta problems. This effort is apparent in the written material provided. In continuation of these efforts, we would also like to assist CALFED in structuring the long-term solution to address concerns regarding contractual commitments, operational flexibility, and environmental improvements in the system.

**We have summarized below the substantive general comments and enclosed the comments pertaining to specific areas of concern. We hope these comments will be helpful to you in finalizing the documents. We wish to note that informal comments were electronically submitted to CALFED on September 25, 1997. These informal comments have been catalogued by CALFED as letter # 97-A48. *We request this formal transmittal replace comments 97-A48, since these finalized comments serve to clarify our previous draft of September 29, 1997.***

We have three general areas of concern: (1) the lack of specificity associated with both the common programs and the alternative descriptions, (2) the need for a description of the rationale used to develop the sub-alternatives, and (3) utilization of analytical tools and results.

The first area of concern pertains to the evaluation and comparison of the "Alternative Solution Concepts," and the lack of detail associated with the concepts. This lack of detail makes it difficult to determine the extent and degree of potential benefits and impacts, in turn resulting in a problematic alternative comparison analysis. We understand that the document is programmatic;

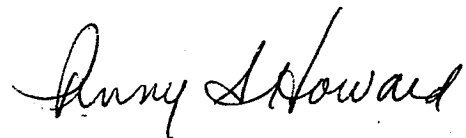
however, there is still a need for sufficient detail in the descriptions of the alternatives and common programs to allow for both a comparative alternative analysis of alternatives as required by Federal Policy and Guidelines, and an impact analysis, as required by both NEPA and CEQA regulations. We recognize CALFED has developed a process to address this concern in its establishment of the Interagency Development Team (IDT). We understand that this team will assist with the formulation and evaluation process and help ensure that the final draft document will provide sufficient detail necessary for a programmatic impact analysis and comparison of alternatives and common programs.

Our second general area of concern is the need for a description of the plan formulation process or rationale used. As a minimum, there needs to be a general outline of the plan formulation process and how it may differ from traditional established processes. This should include a concise description of the objectives, constraints, evaluation criteria, and, ultimately, a brief description or explanation of the general benefits and costs associated with the alternatives. Such a description should help the reader to understand the basis for the alternatives, the screening of them, and, ultimate plan selection. In addition, this will provide a foundation for stakeholder discussion necessary for reaching consensus on a final solution. We are pleased that the IDT has begun work on this type of documentation.

Our third area of concern relates to the utilization of analytical tools and results. The use of the results misrepresents the severity of potential impacts to the Central Valley Project customers. We are particularly concerned about this issue in regards to the power and water quality analyses. We have met with CALFED staff numerous times to discuss the need to display the limitations of analytical tools. We are happy to continue working with program staff on this issue.

Again, we believe that the Interagency Development team will address our first and second concerns. In addition, we are aware of the fact that discussions are ongoing in regards to the utilization of analytical tools and results, specifically in regards to the water quality analysis and the use of DWRSIM as an analytical tool for assessing the impacts to possible power losses.

We would appreciate meeting with CALFED staff to discuss and clarify any comments or concerns addressed in our review of "Phase II Alternative Descriptions" document, and technical appendices. Please feel free to call me at (916) 978-5024.



Enclosure:

General Review Comments  
 Technical Review of Power Production Economics  
 Technical Review of Transportation  
 Technical Review of Flood Control  
 Technical Review of Municipal and Industrial Water Supply  
 Technical Review of Agricultural Economics  
 Technical Review of Riverine Hydraulics & Hydrodynamics  
 Technical Review of Delta Emergency Management Discussion Paper